

Appl. No. 09/351,086  
Appeal Brief In Response  
Reply to final Office action of 18 June 2004

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**IN THE UNITED STATES  
PATENT AND TRADEMARK OFFICE**

Appl. No. : 09/351,086  
Applicant(s) : Nevenka Dimotrova  
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Examiner : Bui, Kieu Oanh T  
Atty. Docket : PHA 23,716

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On: 10 November 2004

By: 

**Title: METHOD AND APPARATUS FOR LINKING A VIDEO SEGMENT TO  
ANOTHER SEGMENT OR INFORMATION SOURCE**

Mail Stop: APPEAL BRIEF - PATENTS  
Commissioner for Patents  
Alexandria, VA 22313-1450

**APPEAL UNDER 37 CFR 41.37**

Sir:

This is an appeal from the decision of the Examiner dated 16 June 2004, finally  
rejecting claims 1-25 of the subject application.

This paper includes (each beginning on a separate sheet):

1. Appeal Brief;
2. Claims on Appeal; and
3. Credit card authorization in the amount of \$340.

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## **APPEAL BRIEF**

### **I. REAL PARTY IN INTEREST**

The above-identified application is assigned, in its entirety, to Philips Electronics North America Corporation, a Delaware company.

### **II. RELATED APPEALS AND INTERFERENCES**

Appellant is not aware of any co-pending appeal or interference which will directly affect or be directly affected by or have any bearing on the Board's decision in the pending appeal.

### **III. STATUS OF CLAIMS**

Claims 1-25 are pending in the application.

Claims 1-10 and 18-25 stand rejected by the Examiner under 35 U.S.C. 102(e).

Claims 11-17 stand rejected by the Examiner under 35 U.S.C. 103(a).

These rejected claims are the subject of this appeal.

### **IV. STATUS OF AMENDMENTS**

An amendment was filed in response to the final Office Action dated 16 June 2004, which canceled claims 21 and 25, but this amendment was not admitted by the Examiner.

### **V. SUMMARY OF CLAIMED SUBJECT MATTER**

The invention comprises a method and system for accessing information from an additional source, based on a selected feature in a video segment from a first source. Each video segment may be considered as a hyperdocument (page 10, line 17). When a user selects an object within the video segment, the system accesses another source that contains information that is associated with the selected object (page 10, line 18 – page 11, line 3).

A link defines a relationship between coordinates of an object in the image and another source that is associated with the object (page 6, lines 14-17). The association may be based on a semantic relationship, visual similarity, scene similarity, event similarity, and so

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on (page 6, line 18 – page 7, line 9; page 8, line 3 - page 9, line 21). When the user selects the object within the image, the associated source is accessed, and the associated information is displayed or stored for later viewing (page 7, lines 10-13; FIG. 6, page 14, lines 12-18). If there are multiple possible associations, the selected association may be based on other factors, such as the current context, user preferences, and so on. (page 7, lines 14-20).

The associations may be contained within the original source, or may be determined upon receipt of the video segment. FIGs. 4 and 5 illustrate example flow diagrams for creating associations (page 12, line 16 – page 14, line 11).

In an alternative embodiment, the information from the other source that is associated with one or more objects in video segments from a first source can be displayed automatically, based on information identifiers within the video, using, for example, a picture-in-picture (PIP) presentation of available material (page 15, lines 4-10).

As claimed in independent claim 1, upon which claims 2-17 depend, the invention comprises a method for processing video, the method comprising:

determining an association between a first video segment including a particular feature and at least one additional information source also including that feature (page 2, lines 18-20; see also FIGs. 4-5); and

utilizing the association to display information from the additional information source (page 2, line 21 – page 3, line 2) based at least in part on a selection by a user of the feature in the first video segment while the video segment is displayed to the user (page 3, lines 10-14; FIG. 6, page 14, line 12 – page 17, line 5).

As claimed in independent claim 18, the invention comprises an apparatus (FIG. 1) for processing video, the apparatus comprising:

a memory (16) for storing an association between a first video segment including a particular feature and at least one additional information source also including that feature (page 7, lines 4-9; page 10, lines 14-16; page 16, lines 12-19); and

a processor (15) coupled to the memory (16) and operative to utilize the association to direct the display of information from the additional information source based at least in part

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on a selection by a user of the feature in the first video segment while the video segment is displayed to the user (page 6, lines 3-12; page 12, lines 7-15; FIG. 6, page 14, lines 12-18).

As claimed in independent claim 19, the invention comprises an apparatus (FIG. 1) for processing video, the apparatus comprising:

a processor (15) operative

(i) to determine an association between a first video segment including a particular feature and at least one additional information source also including that feature (page 7, lines 4-9; page 16, lines 12-19; see also FIGs 4-5); and

(ii) to utilize the association to display information from the additional information source based at least in part on a selection by a user of the feature in the first video segment while the video segment is displayed to the user (page 6, lines 3-12; page 12, lines 7-15; FIG. 6, page 14, lines 12-18).

As claimed in independent claim 20, the invention comprises an article of manufacture comprising a machine-readable medium (page 19, lines 5-12) containing one or more software programs which when executed:

determine an association between a first video segment including a particular feature and at least one additional information source also including that feature (page 7, lines 4-9; page 16, lines 12-19; see also FIGs 4-6); and

utilize the association to display information from the additional information source based at least in part on a selection by a user of the feature in the first video segment while the video segment is displayed to the user (page 6, lines 3-12; page 12, lines 7-15; FIG. 6, page 14, lines 12-18).

As claimed in independent claim 21, the invention comprises a method for processing video, the method comprising:

determining from information in a portion of a first video segment an association between a particular feature of the first video segment and at least one additional information

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source also including that feature (page 2, lines 18-20; page 7, lines 4-9; page 10, lines 14-16; page 16, lines 12-19); and

utilizing the association to enable display of information from the additional information source when the first video segment is displayed (page 6, lines 3-12; page 12, lines 7-15; FIG. 6, page 15, lines 11-21).

As claimed in independent claim 22, the invention comprises an apparatus (FIG. 1) for processing video, the apparatus comprising:

a processor (15) operative

(i) to determine from information in a portion of a first video segment an association between a particular feature of the first video segment and at least one additional information source also including that feature (page 2, lines 18-20; page 7, lines 4-9; page 10, lines 14-16; page 16, lines 12-19); and

(ii) to utilize the association to enable display of information from the additional information source when the first video segment is displayed (page 6, lines 3-12; page 12, lines 7-15; FIG. 6, page 15, lines 11-21).

As claimed in independent claim 23, the invention comprises an article of manufacture comprising a machine-readable medium (page 19, lines 5-12) containing one or more software programs which when executed:

determine from information in a portion of a first video segment an association between a particular feature of the first video segment and at least one additional information source also including that feature (page 2, lines 18-20; page 7, lines 4-9; page 10, lines 14-16; page 16, lines 12-19); and

utilize the association to enable display of information from the additional information source when the video segment is displayed (page 6, lines 3-12; page 12, lines 7-15; FIG. 6, page 15, lines 11-21).

As claimed in independent claim 24, the invention comprises a method for processing video, the method comprising:

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determining an association between (1) a portion of a video signal, the portion including a feature, and (2) at least one other information source also including the feature (page 7, lines 4-9; page 16, lines 12-19; see also FIGs 4-6); and

utilizing the association to enable display of information from the other information source (page 6, lines 3-12; page 12, lines 7-15) based at least in part on a selection by a user of the feature in the portion of the video signal while the video segment is displayed to the user (page 6, lines 3-12; page 12, lines 7-15; FIG. 6, page 14, lines 12-18).

As claimed in independent claim 25, the invention comprises a method for processing video, the method comprising:

determining from information in a portion of a video signal an association between a feature of the video signal and at least one other information source also including that feature (page 2, lines 18-20; page 7, lines 4-9; page 10, lines 14-16; page 16, lines 12-19); and

utilizing the association to enable display of information from the other information source when the video segment is displayed (page 6, lines 3-12; page 12, lines 7-15; FIG. 6, page 15, lines 11-21).

#### **VI. ISSUES TO BE REVIEWED ON APPEAL**

Claims 1-10 and 18-25 stand rejected under 35 U.S.C. 102(e) over Abecassis (USP 6,553,178).

Claims 11-16 stand rejected under 35 U.S.C. 103(a) over Abecassis and Jain et al. (USP 6,463,444, hereinafter Jain).

Claim 17 stands rejected under 35 U.S.C. 103(a) over Abecassis.

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## **VII. ARGUMENT**

### **Rejection under 35 U.S.C. 102(e) over Abecassis**

#### **Claims 21-23 and 25**

Claims 21 and 25 claim a method for processing video comprising determining from information in a portion of a first video segment an association between a particular feature of the first video segment and at least one additional information source also including that feature and utilizing the association to enable display of information from the additional information source when the first video segment is displayed.

Claim 22 claims an apparatus for processing video that includes a processor that determines from information in a portion of a first video segment an association between a particular feature of the first video segment and at least one additional information source also including that feature and using the association to enable display of information from the additional information source when the first video segment is displayed.

Claim 23 claims a software program that determines from information in a portion of a first video segment an association between a particular feature of the first video segment and at least one additional information source also including that feature and utilizes the association to enable display of information from the additional information source when the video segment is displayed.

Abecassis teaches compensating a viewer for purposefully viewing an advertisement (Abecassis Abstract). As illustrated in Abecassis's FIG. 11B, the user selects the advertisement to be viewed at 1120-1122. To earn credit for viewing, Abecassis's system verifies that the user is actually viewing the material by periodically requesting a viewer's response, at 1150-1160. Abecassis's FIGs. 12A-12B illustrate an example user interface. In FIG. 12A, the user is presented with a video 1201, and is given the option of selecting the display of other advertisements, via the option icons 1203 (Abecassis column 47, lines 30-45). In FIG. 12B, the user is provided option icons 1221-1222 for obtaining additional information related to the viewed video, or for sending information 1223 to the product supplier.

Abecassis does not teach determining an association between a feature in a first video segment and the same feature in an additional information source. Abecassis is silent with

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regard to features within the displayed video segment 1201. Abecassis notes that the option buttons 1221-1222 are associated with the product that is advertised in the displayed video segment 1201, but does not teach that the option buttons 1221-1222 are related to any particular feature within the displayed video. Further, Abecassis is silent with regard to the form of the response to a user's activation of one of the buttons 1221-1222, and does not teach that the information from the additional information source will be displayed, and/or enabled for display, coincident with the original video segment.

Because Abecassis does not teach determining from information in a portion of a first video segment an association between a particular feature of the first video segment and at least one additional information source also including that feature, and because Abecassis does not use the association to display the information from the additional information source when the video segment is displayed, as specifically claimed in each of claims 21-23 and 25, the applicant respectfully maintains that claims 21-23 and 25 are patentable under 35 U.S.C. 102(e) over Abecassis.

#### **Claims 1-10, 18-20, and 24**

Claim 1, upon which claims 2-10 depend, and claim 24 claim a method for processing video that includes the above referenced determination of an association between a feature in a first video segment and an additional information source, with a further limitation of displaying information from the additional information source based at least in part on a selection by a user of the feature in the first video segment while the video segment is displayed to the user.

Claims 18 and 19 claim an apparatus for processing video that includes a memory that stores the above referenced association between a feature in a first video segment and an additional information source, and further claims a processor that displays information from an additional information source based at least in part on a selection by a user of the feature in the first video segment while the video segment is displayed to the user.

Claim 20 claims a software program that provides the above referenced determination of an association between a feature in a first video segment and an additional information source, and further displays information from an additional information source based at least



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in part on a selection by a user of a feature in the first video segment while the video segment is displayed to the user.

In addition to the remarks above regarding Abecassis and the determination of an association between a feature in a first video segment and an additional information source, the following remarks are provided with regard to Abecassis and claims 1-8, 18-20, and 24.

Abecassis does not teach the selection of a feature in the displayed video segment 1201. Of particular note, and as acknowledged in the final Office action (page 3, lines 5-8), Abecassis's user selects information or other actions via conventional "button" icons 1221-1223, which are external to the video segment 1201. Also of note, Abecassis's button icons relate directly to the information that is being requested, such as obtaining a quote 1221 or contacting a sales agent 1222, and do not correspond to the selection of a "feature" contained in the viewed video segment 1201.

Because Abecassis does not teach an association between a particular feature of the first video segment and at least one additional information source that also includes that feature, and because Abecassis does not teach displaying information from the additional information source based at least in part on a selection by a user of the feature in the first video segment while the video segment is displayed to the user, as specifically claimed by the applicant, the applicant respectfully maintains that claims 1-10, 18-20, and 24 are patentable over Abecassis.

### **Rejection under 35 U.S.C. 103(a) over Abecassis**

#### **Claim 17**

Claim 17 is dependent upon claim 1, and claims a method for processing video comprising determining an association between a first video segment including a particular feature and at least one additional information source also including that feature and utilizing the association to display information from the additional information source based at least in part on a selection by a user of the feature in the first video segment while the video segment is displayed to the user, wherein determining the association is based at least in part on at least one of a similarity measure and a clustering technique.

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Based on the remarks presented above regarding Abecassis, the applicant respectfully maintains that Abecassis neither teaches nor suggests determining an association between a first video segment including a particular feature and at least one additional information source also including that feature, and neither teaches nor suggests utilizing the association to display information from the additional information source based at least in part on a selection by a user of the feature in the first video segment while the video segment is displayed to the user, as specifically claimed in claim 1, upon which claim 17 depends. Therefore, the applicant respectfully maintains that claim 17 is patentable under 35 U.S.C. 103(a) over Abecassis.

**Rejection under 35 U.S.C. 103(a) over Abecassis and Jain**

**Claims 11-16**

Claims 11-16 are dependent upon claim 1, discussed above with regard to Abecassis.

The final Office action relies upon Jain for teaching various aspects of feature extraction from a video segment.

The applicant respectfully maintains, however that claims 11-16 are patentable over Abecassis and Jain, based on the remarks above regarding claim 1 and Abecassis. In particular, Abecassis does not teach or suggest displaying information from an additional information source based at least in part on a selection by a user of a feature in a first video segment while the video segment is displayed to the user. Jain is silent with regard to displaying additional information based on a selection of a feature in a displayed video segment.

Because neither Abecassis nor Jain, individually or collectively, teach or suggest displaying information from an additional information source based at least in part on a selection by a user of a feature in a first video segment while the video segment is displayed to the user, as specifically claimed in claim 1, and because Abecassis specifically teaches obtaining information from another source based on a user's selection of an option button that is external to the displayed video segment, the applicant respectfully maintains that claims 11-16 are patentable under 35 U.S.C. 103(a) over Abecassis and Jain.

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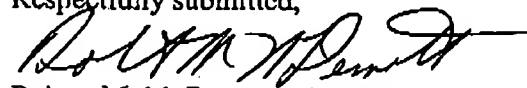
### CONCLUSIONS

Because Abccassis does not teach or suggest an association between a particular feature of the first video segment and at least one additional information source that also includes that feature, and because Abecassis does not teach or suggest displaying information from the additional information source based at least in part on a selection by a user of the feature in the first video segment while the video segment is displayed to the user, the applicant respectfully requests that the Examiner's rejection of claims 1-10, 18-20, and 24 under 35 U.S.C. 102(e), and claim 17 under 35 U.S.C. 103(a) be reversed by the Board, and the claims be allowed to pass to issue.

Because Abecassis does not teach determining from information in a portion of a first video segment an association between a particular feature of the first video segment and at least one additional information source also including that feature, and because Abccassis does not use the association to display the information from the additional information source when the video segment is displayed, the applicant respectfully requests that the Examiner's rejection of claims 21-23 and 25 under 35 U.S.C. 102(e) be reversed by the Board, and the claims be allowed to pass to issue.

Because neither Abecassis nor Jain, individually or collectively, teach or suggest displaying information from an additional information source based at least in part on a selection by a user of a feature in a first video segment while the video segment is displayed to the user, as specifically claimed in claim 1, upon which claims 11-16 depend, and because Abccassis specifically teaches obtaining information from another source based on a user's selection of an option button that is external to the displayed video segment, the applicant respectfully requests that the Examiner's rejection of claims 11-16 under 35 U.S.C. 103(a) be reversed by the Board, and the claims be allowed to pass to issue.

Respectfully submitted,



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